

Jack P. Burden, Esq.
 Nevada State Bar No. 6918
 Jacquelyn Franco, Esq.
 Nevada State Bar No. 13484
BACKUS | BURDEN
 3050 South Durango Drive
 Las Vegas, NV 89117
 (702) 872-5555
 (702) 872-5545
jburden@backuslaw.com
jacquelynfranco@backuslaw.com
DallinKnecht@backuslaw.com
 Attorneys for Defendant,
Albertson's LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MACHELLE SINGH, individually,)	Case 2:23-cv-00436-APG-MDC
)	
Plaintiff,)	STIPULATION AND ORDER TO
vs.)	CONTINUE DEADLINE FOR
)	PROPOSED JOINT PRETRIAL ORDER
ALBERTSON'S LLC d/b/a ALBERTSONS, a)	FOR 30 DAYS
foreign limited-liability company; DOES I)	
through X; and ROE CORPORATIONS I)	
through X, inclusive)	
)	
Defendants.)	

Plaintiff MACHELLE SINGH ("Plaintiff"), by and through her attorney of record, M. Erik Ahlander, Esq. of the law firm AHLANDER INJURY LAW, and Defendant ALBERTSON'S LLC ("Defendant"), by and through its attorneys of record, Jack P. Burden, Esq. and Jacquelyn Franco, Esq. of the law firm of BACKUS | BURDEN, hereby stipulate and agree to an extension of the deadline to file Proposed Joint Pretrial Order by thirty (30) days.

The Proposed Joint Pretrial Order is currently due to the Court by April 8, 2024. The Parties are actively engaged in settlement negotiations. The requested extension will allow the parties sufficient time to complete the negotiations or, if necessary, prepare and file the Joint Pretrial Order.

Pursuant to LR IA 6-1(b), the Parties hereby aver that this is the first extension requested

as it relates to the Joint Pretrial Order. Moreover, pursuant to Local Rule 26-3, it is respectfully submitted the Parties' failure to request the instant extension prior to the filing deadline was the result of excusable neglect; specifically noting the failure to request the extension of was a mere oversight by the Parties. *Bateman v. U.S. Postal Service*, 231 F.3d 1220 (9th Cir. 2000). Further: 1) there is no danger of prejudice as the extension is stipulated by the Parties; 2) a thirty (30) day extension will not impact a trial date because the same has not been scheduled; 3) the Parties are hopeful to attend a settlement conference within the requested extended period; and 4) the requested extension is made in good faith by both Parties. *Pioneer Investment Services v. Brunswick Associate's, Ltd.*, 507 U.S. 380, 395 (1993).

As such, the Parties stipulate and agree to jointly ask the Court to extend the deadline to submit the Proposed Joint Pretrial Order by 30 days to May 8, 2024.

IT IS SO STIPULATED.

DATED this 5th day of April, 2024.

AHLANDER INJURY LAW

/s/ M. Erik Ahlander

M. Erik Ahlander, Esq.
Nevada Bar No. 9490
9183W, Flamingo Rd., Ste. 110
Las Vegas, Nevada 89147
Counsel for Plaintiff

DATED this 5th day of April, 2024.

BACKUS | BURDEN

/s/ Jack Burden

Jack P. Burden, Esq.
Nevada Bar No. 6918
Jacquelyn Franco, Esq.
Nevada Bar No. 13484
3050 South Durango Drive
Las Vegas, Nevada 89117
Counsel for Defendant

ORDER

IT IS HEREBY ORDERED that the Parties shall submit the Proposed Joint Pretrial Order by May 8, 2024. The parties must comply with LR IA 6-1 for any future extensions or continuances.

IT IS SO ORDERED.

DATED: this 8th day of April 2024



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge